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Department of Energy

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morandum APR 14 10 27 AM '92 Rocky Flats Office

DATE **ACTION** DIST BENJAMIN A BERMAN, HS BRANCH, DB BURLINGAME, A.H. CARNIVAL, G.J COPP, RD CROUCHER, DW DAVIS, J.G. EVERED, JE FERRERA, DW GOODWIN, R HANNI, B J HEALY, TJ HILBIG, JG IDEKER, E H KERSH, J M KIRBY, W A KRIEG, D KUESTER, A W LEE, E M MAJESTIC, J R MARX, GE MORGAN, RV PIZZUTO, V M POTTER, G L SANDLIN, N B SHEPLER, R I SULLIVAN, M T SWANSON E R TALLMAN, K.G. WIEBE JS WILKINSON, R.B. WILSON, J M YOUNG, E.R. ZANE, JO Bunge SUIT AND AND

APR 1 3 1992

EG&G ROCKY FLATS PLAHT CORRESPONDENCE CONTFOL

ERD RHB 4156

Conditional Approval of the Operable Unit 3 Final Phase RFI/RI Work Plan

Paul Bunge, Acting Director Remediation Programs Division EG&G Rocky Flats, Inc

Please be advised that EPA granted conditional approval of the Operable Unit 3 Final Phase RFI/RI Work Plan on March 17, 1992 CDH recommended approval to EPA on January 14, 1992 Approval was granted "on the condition that issues related to the ongoing site wide ARARs discussions are resolved to EPA's satisfaction" The letters from EPA and CDH are attached for your review Questions can be directed to Robert H Birk at extension 5921

Frazer R Lockhart

Director

for Environmental Management

Attachments

cc w/Attachments M Guillaume, EG&G

CORRES CONTROL X X TRAFFIC

Reviewed for Addressee
Corres Control RFP

4-14-92

DATE

BY

Ref Ltr #

ADMIN RECORD

A-0U03-0005#2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500 RECEIVED
DENVER, COLORADO 80202-2466 U 5 D O E

1997 NAR 19 A 7 36

MAR 1 7 1992

Ref: 8HWM-FF

Mr. Frazer Lockhart U.S. Department of Energy Rocky Flats Office P.O. Box 928 Golden, CO 80402-0928

RE: Final RFI/RI Work Plan for Operable Unit 3 (OU 3)

Dear Mr. Lockhart:

EPA has reviewed the above referenced document which was submitted by the Department of Energy (DOE) on February 28, 1992 We believe the document meets the conditions for approval set forth in our comments and the comments of the Colorado Department of Health in correspondence dated January 15, 1992. As lead regulatory agency, EPA grants approval of the Final RFI/RI Work Plan for OU 3 on the condition that issues related to the ongoing site wide ARARS discussions are resolved to EPA's satisfaction.

If you have any questions or concerns regarding OU 3, please contact Bonnie Lavelle at (303)294-1067.

Sincerely,

Manti Berhose

Martin Hestmark, Manager Rocky Flats Project

cc: Robert Birk, DOE
Paul Bunge, EG&G
Michael Guillaume, EG&G
Gary Baughman, CDH
Joe Schieffelin, CDH

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4210 East 11th Avenue Denver, Colorado 80220-3716 Phone (303) 320-8333

Hazardous Materials and Waste Management Division Telefax Number (303) 331-4401 Telefax Numbers Main Building/Denver (303) 322-9076

Ptarmigan Place/Denver (303) 320-1529

First National Bank Building/Denver (303) 355-6559

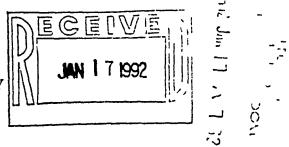
Grand Junction Office (303) 248-7198

Pueblo Office (719) 543-8441 ROY ROMER Governor

JOEL KOHN
Interim Executive Director

January 14, 1992

Mr. Martin Hestmark
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405



RE: Final Phase I RFI/RI Workplan for OU 3 - Offsite Areas, December, 1991

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and it's prime operating contractor, EG&G. 'Ine Division's brief comments are attached. We recommend that EPA grant approval to this document.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

Gary W. Baugnman

Unit Leader, Hazardous Waste Facilities

Hazardous Materials and Waste Management Division

CC: {Frazer Lockhart, DOE
Bob Birk, DOE
Paul Bunge, EG&G
Michael Guillaume, EG&G
Barbara Barry, RFPU

5001

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Colorado Department of Health

Review and Comment

Final Phase I RFI/RI Workplan, OU 3 - Offsite Areas
December, 1991

General Comments:

1) The only major issue that was not addressed in this final version of the OU 3 RFI/RI Workplan is the analysis for metals in the surficial soils. The Division, based on the latest information compiled in the Dose Reconstruction Survey (the CDH/ChemRisk initiative), has decided that the possibility of measurable concentrations of the metal compounds of concern in the offsite surficial soils is very remote. Therefore, we will not press our demand that the soil analysis include metals. However, since DOE has adamantly refused to add metals to the analytical suite for soils, DOE must recognize that at any future time when information becomes available that indicates metals may have contaminated offsite soils, DOE will be liable to investigate and characterize this contamination, no matter what the cost at that time will be. In light of this cost factor, it still seems prudent to us that DOE add that analysis to this investigation.

Specific Comments:

<u>Section 1 3.4 2:</u> The values stated in this section for hydraulic conductivity are not representative of values the Division has seen for the geologic units mentioned. In fact, hydraulic conductivities that we have seen for the plant-site indicate that the actual value is at least two orders of magnitude higher.

Figure 2-8. The only data point on this map that is germane to the major plutonium and americium contamination offsite is data point 1-360. However, there is no mean and standard deviation listed for this data point. Please include this information or state why it is unavailable.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500 RECEIVED
DENVER, COLORADO 80202-2466 USDOE MAIL POOM

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1992 MAR 19 A 7-36

Ref: 8HWM-FF

Mr. Frazer Lockhart U.S. Department of Energy Rocky Flats Office P.O. Box 928 Golden, CO 80402-0928

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Mant leshos

Martin Hestmark, Manager Rocky Flats Project

cc: Robert Birk, DOE Paul Bunge, EG&G

Michael Guillaume, EG&G

MIL

Gary Baughman, CDH Joe Schieffelin, CDH

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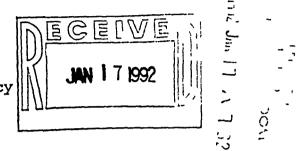
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Interim Executive Director

January 14, 1992

Mr. Martin Hestmark
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999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405



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Gary W. Baughman

Unit Leader, Hazardous Waste Facilities

Hazardous Materials and Waste Management Division

CC: {Frazer Lockhart, DOE
Bob Birk, DOE
Paul Bunge, EG&G
Michael Guillaume, EG&G
Barbara Barry, RFPU

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WHO

Colorado Department of Health

Review and Comment

Final Phase I RFI/RI Workplan, OU 3 - Offsite Areas
December, 1991

General Comments:

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Specific Comments:

Section 1.3.4.2: The values stated in this section for hydraulic conductivity are not representative of values the Division has seen for the geologic units mentioned. In fact, hydraulic conductivities that we have seen for the plant-site indicate that the actual value is at least two orders of magnitude higher.

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